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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

3:14-CV-554 SI

Civil Case No. _____
(to be assigned by Clerk of the Court)

THOMAS, NATHAN LEE
(Enter full name of plaintiff(s))

Plaintiff(s),

COMPLAINT

Jury Trial Demanded
☒ Yes ☐ No

v.
METTIE, ANGELA M. BEARDEN, DAVID T.
HEMMER, JERI SUE, RONI GOMEZ, ANGELA
RAY, EDWARD J.
(Enter full name of ALL defendant(s))

Defendant(s).

I. PARTIES

List your name, address, and telephone number below, and the same information for each defendant. Make sure that the defendant(s) listed below are identical to those contained in the caption of the complaint. Attach additional sheets of paper if necessary.

Plaintiff

Name: NATHAN LEE THOMAS
Street Address: PO BOX 9261
City, State & Zip Code: PORTLAND, OR 97207
Telephone No. (503) 960-6861

Defendant No. 1

Name: ANGELA M. METTIE
Street Address: 3303 SW BOND AVE
City, State & Zip Code: PORTLAND, OR 97239
Telephone No. (503) 494-5778

Defendant No. 2

Name: DAVID T. BEARDEN
Street Address: 3303 SW BOND AVE
City, State & Zip Code: PORTLAND, OR 97239
Telephone No. (503) 494-5778

Defendant No. 3

Name: JERI HEMMER
Street Address: 122 KERR ADMIN BLDG
City, State & Zip Code: CORVALLIS, OR 97331
Telephone No. (541) 737-3103

Defendant No. 4

Name: RONI SUE
Street Address: 402 KERR ADMIN BLDG
City, State & Zip Code: CORVALLIS, OR 97331
Telephone No. (541) 737-3556

DEFENDANT NO. 5
DEFENDANT NO. 6 SEE ATTACHED (PAGE 6) *11/15*

II. JURISDICTION

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. A case involving the United States Constitution or federal laws or treaties is a federal question case. A case in which a citizen of one state sues a citizen of another state and the amount in damages claimed is more than \$75,000 is a diversity of citizenship case.

A. What is the basis for federal court jurisdiction (check all that apply)

☒ Federal Question

☐ Diversity of Citizenship

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory, or treaty right is at issue?

TITLE I + V OF THE AMERICANS WITH DISABILITIES ACT WHICH PROHIBITS EMPLOYMENT DISCRIMINATION AGAINST INDIVIDUALS WITH DISABILITIES

- C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state of citizenship OREGON

Defendant(s) state(s) of citizenship OREGON

III. STATEMENT OF CLAIMS

Claim I

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

FORCED TO IDENTIFY AS DISABLED AGAINST MY WILL. TITLE I and V OF THE AMERICANS WITH DISABILITIES ACT SPECIFICALLY STATES INDIVIDUALS MUST BE GIVEN THE OPPORTUNITY TO SELF IDENTIFY AND THIS WAS NEVER OFFERED. ON OR ABOUT OCTOBER 01, 2011 I WAS CONTACTED BY JERI HEMMER WHO DISHONESTLY AND INTENTIONALLY MADE THE FALSE STATEMENT INDICATING I HAD SELF IDENTIFIED MYSELF TO MS. ANGELA M. METTIE AND THAT I HAD ALSO ASKED FOR REASONABLE ACCOMMODATION WHICH I HAD DONE NEITHER. FURTHER MORE DURING A MEETING WITH JERI HEMMER ON OR ABOUT OCTOBER OR NOVEMBER 2011 I WAS GIVEN A DOCUMENT TO SIGN BY JERI HEMMER WHO INDICATED IF I DID NOT SIGN IT I WOULD BE TERMINATED.

Claim II

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

FAILED TO PROVIDE REASONABLE ACCOMODATIONS. DURING A PHONE CONVERSATION WITH RONI SUE PRIOR TO MY RETURN TO WORK IN THE MONTHS OF NOVEMBER AND DECEMBER OF 2011 OR JANUARY OF 2012 RONI SUE DENIED MY REQUEST TO BE TRANSFERRED TO ANOTHER DEPARTMENT THEN IN BOTH OCTOBER OF 2012 AND APRIL OF 2013 SHE DENIED MY REQUEST FOR A MEETING WITH A MEDIATOR AS REQUESTED BY MY THERAPIST AS A REASONABLE ACCOMADATION PRIOR TO RETURNING TO WORK.

Claim III

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

FAILED TO HOLD ACCOUNTABLE EMPLOYEES ENGAGED IN DISCRIMINATORY PRACTICES. ON SEVERAL OCCASIONS DATING FROM FEBRUARY OF 2012 TO APRIL OF 2013 I MADE SEVERAL VERBAL AND WRITTEN REQUESTS OF RONI SUE TO INVESTIGATE THE DISCRIMINATORY ACTS OF MS. ANGELA M. METTIE AND DAVID T. BEARDEN TO NO AVAIL. WHEN IT BECAME EVIDENT RONI SUE WAS ALSO DISCRIMINATING AGAINST ME I CONTACTED HER SUPERVISOR ANGELO GOMEZ WHO DENIED MY REQUEST FOR AN INTERVIEW. AFTERWARD IN APRIL OF 2013 I CONTACTED EDWARD J. RAY TO NOTIFY HIM OF THE REFUSAL AND DISCRIMINATION AND MY REQUEST FOR A MEETING WAS AGAIN DENIED.

(If you have additional claims, describe them on another piece of paper, using the same outline.)


IV. RELIEF

State briefly exactly what you want the court to do for you and the amount, if any, of monetary compensation you are seeking. Make no legal arguments. Cite no cases or statutes.

\$ 29,184.00 IN LOST WAGES AND
A WRITTEN FORMAL ADMISSION OF
GUILT FOLLOWED BY AN APOLOGY
WITH FULL REINSTATEMENT OF MY
FORMER POSITION WITHIN THE UNIVERSITY,
UPON REMOVING ME FROM MEDICAL LEAVE.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 31st day of MARCH, 2014.


NATHAN LEE THOMAS
(Signature of Plaintiff(s))

DEFENDANT No. 5

ANGELO GOMEZ
402 KERR ADMIN BLDG
CORVALLIS, OR 97331
(541) 737-3556

DEFENDANT No. 6

EDWARD J. RAY
600 KERR ADMIN BLDG
CORVALLIS, OR 97331
(541) 737-4133